

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Barbara Jean Meekins)	
)	
)	Case No. <u>14-34905-KRH</u>
)	
)	
Debtor(s))	Chapter <u>13</u>
)	
Address)	
171 Crater Woods Ct.)	
Petersburg, VA 23805)	
Last four digits of Soc Sec No(s): <u>0901</u>)	
)	
)	

NOTICE OF MOTION (OR OBJECTION)

Barbara Jean Meekins has filed papers with the court to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before June 14, 2016, you or your attorney must:

- ☐ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.
8501 Mayland Dr., Ste 106
Henrico, VA 23294

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- ☐ Attend the hearing on the motion (or objection) scheduled to be held on _____ at _____ . m. at United States Bankruptcy Court, 701 East Broad Street, Crtrm <5100/5000> Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 5/24/2016

Signature, name, address, and telephone number of person giving notice:

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

America Law Group

8501 Mayland Dr., Ste 106

Henrico, VA 23294

Virginia State Bar No. 29640

Counsel for Barbara Jean Mekkins

Certificate of Service

I hereby certify that I have this 24th day of June, 2016, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

Creditors

American InfoSource LP as agent for
Verizon
PO Box 248838
Oklahoma City, OK 73124-8838

Atlas Acquisitions LLC
294 Union St.
Hackensack, NJ 07601

Berks Credit & Coll
900 Corporate Dr
Reading, PA 19605-0000

Capital 1 Bank
Attn: General Correspondence
Po Box 30285
Salt Lake City, UT 84130-0000

Cavalry Investments, LLC
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595

CERASTES, LLC
C O WEINSTEIN, PINSON, AND RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121

Credit Acceptance

Attn: Bankruptcy Dept
25505 West 12 Mile Rd Ste 3000
Southfield, MI 48034-0000

Dominion Law Associates

PO Box 62719
Virginia Beach, VA 23462-0000

Dominion Virginia Power

P.O. Box 26666
Richmond, VA 23261-0000

Drive Time

4020 E Indian School Rd
Phoenix, AZ 85018-0000

Dt Credit

4020 E Indian School Rd
Phoenix, AZ 85018-0000

DT Credit Company LLC

PO Box 29018
Phoenix, AZ 85038

ECMC

PO BOX 16408
St. Paul, MN 55116

Focus Recovery Solutions

Attn: Bankruptcy
9701 Metropolitan Court Ste B
Richmond, VA 23236-0000

Jefferson Capital Systems LLC

Po Box 7999
Saint Cloud Mn 56302-9617

Midland Credit Management, Inc

as agent for MIDLAND FUNDING LLC
PO Box 2011
Warren, MI 48090

Midland Funding

8875 Aero Dr Ste 200
San Diego, CA 92123-0000

Nco Fin/38

2360 Campbell Crk Ste 50
Richardson, TX 75082-0000

Nys Higher Ed Services

99 Washington Ave
Albany, NY 12255-0000

Radiology Associates of Richmo

PO Box 79923
Baltimore, MD 21279-0000

Synchrony Bank

c/o Recovery Mgmt Systems Corp
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605

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c/o of Recovery Management Systems Corp
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Verizon Communications

P O Box 920041
Dallas, TX 75392-0000

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In RE: Barbara Jean Meekins

Debtor

Case No.: 14-34905-KRH
Chapter 13

MOTION TO PURCHASE AND FINANCE REAL PROPERTY

Comes now the Debtor, by counsel, and as for his Motion to Purchase and Finance Real Property states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on 9/10/2014.

Debtor desires to purchase and finance real property described below, from Scott & Lori Fielding, described as

Chesswood L 20 BK F SEC D

more commonly known as:

9031 Lost Forest Dr. Chesterfield, VA 23237.

2. This Court has exclusive jurisdiction over the property in question under 28 USC Section 1334. This is a core matter.

3. The purchase price for the real property is \$138,000.00. The approximate closing costs are \$5,540.40

4. The loan amount for the real property is \$135,500.00. The proposed balance is to be financed with C&F Mortgage. The term of the loan is 360 months with an interest rate of 3.75%. Monthly principal, interest, taxes, & insurance payments are in the amount of \$874.42 for 360 months.

5. The purchase and financing of the real property would not prejudice the rights of any party, and would allow the debtor to comply with the terms of their confirmed Chapter 13 plan. The debtor has an opportunity to purchase a home with a payment within their means. The debtor's current budget allows for a rent payment in the amount of \$834.00 a month. Although the mortgage payment would be slightly higher than her current rent payment, Debtor feels confident she can cut expenses enough to afford the difference. She also believes that the benefits of home ownership will offset the higher household expense in the long term.

Wherefore, the Debtor, Barbara Jean Meekins, requests that the Court enter an Order authorizing the Purchase of Real Estate in accordance with the terms of the Purchase Agreement and the financing of real property in accordance with the terms of the Loan Agreement with C&F Finance, that the debtor be granted such motion.

DATED , 5/24/2016.

Barbara Jean Meekins

By /s/Richard James Oulton
Of Counsel

Richard James Oulton, Esquire
VSB# 29640
America Law Group, Inc.
8501 Mayland Dr., Ste 106
Richmond, VA 23294
(804) 308-0051

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served by electronic means or mailed, by first class mail, a true and accurate copy of the foregoing Motion for the Purchase and Finance of Real Property and Request for Attorney Compensation was sent to the U.S. Trustee, Richmond, VA 23220 and Suzanne Wade, Chapter 13 Trustee, P.O. Box 1780 Richmond, VA 23219-1780 and all creditors and necessary parties on 5/24/2016.

/s/Richard James Oulton
Richard James Oulton

Creditors

American InfoSource LP as agent for
Verizon
PO Box 248838
Oklahoma City, OK 73124-8838

Atlas Acquisitions LLC
294 Union St.
Hackensack, NJ 07601

Berks Credit & Coll
900 Corporate Dr
Reading, PA 19605-0000

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Attn: General Correspondence
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PO Box 29018
Phoenix, AZ 85038

ECMC
PO BOX 16408
St. Paul, MN 55116

Focus Recovery Solutions
Attn: Bankruptcy
9701 Metropolitan Court Ste B
Richmond, VA 23236-0000

Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud Mn 56302-9617

Midland Credit Management, Inc
as agent for MIDLAND FUNDING LLC
PO Box 2011
Warren, MI 48090

Midland Funding

8875 Aero Dr Ste 200
San Diego, CA 92123-0000

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2360 Campbell Crk Ste 50
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99 Washington Ave
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25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605

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c/o of Recovery Management Systems Corp
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Verizon Communications

P O Box 920041
Dallas, TX 75392-0000

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In RE: Barbara Jean Meekins

Debtor

Case No.: 14-34905-KRH
Chapter 13

**PROPOSED
ORDER AUTHORIZING THE PURCHASE AND FINANCE REAL PROPERTY**

This matter came to be heard upon the Motion of the Debtor for the authority to purchase and finance real property, and it appearing to the Court that the debtor has the opportunity to purchase real property located at 9031 Lost Forest Dr. Chesterfield, VA 23237, for the purchase price of \$138,000.00, with approximate closing costs of \$5,540.40, and to finance the purchase through C&F Finance, by a loan in the amount of \$135,500.00 with an interest rate of 3.750%, and monthly principal, interest, taxes, & insurance payments in the amount of \$874.42 for 360 months.

The Court further determining that it does not prejudice the interests of the creditors and parties in interest in this case to allow this purchase and finance to take place, and for these reasons and other good cause shown, it is hereby

ORDERED that the debtor is authorized to PURCHASE & FINANCE real property, described as

Chesswood L 20 BK F SEC D

more commonly known as:

9031 Lost Forest Dr. Chesterfield, VA 23237

and it is

FURTHER ORDERED that prior to the actual closing of this transaction, the settlement agent shall forward to counsel for the debtor and the chapter 13 trustee a proposed HUD-1 for review. It shall be the responsibility of counsel for the debtor to review these documents to assure that the terms of this Order and the payment of the proper amount to the Chapter 13 are provided for, and it is

FURTHER ORDERED that immediately after the closing the settlement agent shall provide a fully executed copy of the settlement statement and/or HUD-1 to counsel for the debtor and the Chapter 13 Trustee..

I ask for this:

/s/ Richard James Oulton
Richard James Oulton
Counsel for Debtor

Seen and approved:

Suzanne Wade
Chapter 13 Trustee

Entered on Docket _____

U.S. Bankruptcy Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served by electronic means or by mail first class a true accurate copy of the Proposed Order to Authorize the Purchase and Finance of Real Property to all creditors and to all necessary parties on 5/24/2016.

/s/ Richard J. Oulton
Richard J. Oulton, Attorney for Debtor

PARTIES TO RECEIVE COPIES:

America Law Group, Inc.
8501 Mayland Dr. Ste 106 Henrico, VA 23294

Suzanne Wade, Chapter 13 Trustee
P.O. Box 1780 Richmond, VA 23219-1780

Barbara Meekins
171 Crater Woods Ct. Petersburg, VA 23805

America Law Group, Inc.
8501 Mayland Dr., Ste 106 Henrico, VA 23294